

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

PRECI-DIP SA,
a Swiss Corporation,

Plaintiff,

V.

TRI-STAR ELECTRONICS
INTERNATIONAL, INC.,
a Delaware Corporation,

Defendant.

Honorable Judge Ronald A. Guzman
Honorable Magistrate Judge Ashman

Case No. 08-CV-4192

MOTION FOR PRELIMINARY INJUNCTION

Now comes the Plaintiff, Preci-Dip SA (“Preci-Dip”), and hereby moves, pursuant to Rule 65 of the Federal Rules of Civil Procedure, for a Preliminary Injunction against Defendant Tri-Star Electronics International, Inc., (hereinafter, “Tri-Star”) based on the allegations in the Complaint, and the Declaration of Patrick Loviat. By this Motion and pending a full trial on the merits, Preci-Dip seeks to prevent Tri-Star from continuing to willfully and perniciously damage Preci-Dip’s name and goodwill by contacting customers, and distributors with its baseless claims of infringement.

Tri-Star has embarked on a bad-faith and malicious campaign targeted at smearing the goodwill associated with Preci-Dip's name and its products and threatening Preci-Dip's own actual and potential customers and distributors with legal proceedings for buying, selling or using the Preci-Dip product. In particular, Tri-Star has intentionally used in commerce in this smear campaign false and misleading representations of fact, such as the false representation that the Preci-Dip Reversed Clip Contact did not meet the military specifications for which it was

designed. Such statements misrepresent the characteristics and qualities of Preci-Dip's goods. Indeed, during its conversations with Preci-Dip's current and potential customers, including distributors of Preci-Dip's products, Tri-Star employed coercion and misrepresentations as well as the concealment or omission of multiple material facts, with intent that Preci-Dip's customers and distributors rely upon such representations and omissions to cease the purchasing and sale of Preci-Dip's products.

WHEREFORE, Preci-Dip respectfully requests that the Court enter a Preliminary Order enjoining Defendants from contacting or communicating with any individual or entity, or current or potential end user of either Preci-Dip's or Tri-Star's products, and discussing anything related to this suit pending a full hearing on the merits.

PLAINTIFF DEMANDS A JURY TRIAL ON ALL ISSUES.

Dated: August 15, 2008

Respectfully Submitted,

By: s/ Robert E. Browne
One of the Attorneys for Plaintiff,
Preci-Dip SA

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **Plaintiff's Motion for Preliminary Injunction** has been served upon the individuals listed below via the CM/ECF electronic filing service system and via Federal Express on this 15th day of August, 2008

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s/Maurice E. Finnegan III

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NGEDOCs: 1551572.2